

M E M O R A N D U M

DATE: November 17, 1987
TO: LPC - Division File
FROM: P. M. McCarthy *PM*
SUBJECT: 1630450038 - St. Clair County - East St. Louis/Wastex
ILD980700744
RCRA - Enforcement

EPA Region 5 Records Ctr.



315969

On November 6, 1987, R. Ballard and this writer conducted a Consent Decree inspection. We met with General Manager, Terry Hein, and Alvin Markle. The main purpose of this inspection was to determine if they had complied with the conditions which became effective ninety days after the July 31, 1987 signing of the Decree.

The two requirements which became effective on October 29, 1987 relate to container management. A4 of the Consent Decree directs Wastex to properly close and seal all non-Chase inventory, and to arrange them two high and two wide. All drums, other than 299 of old Wastex inventory (in Bldg. 3/22), have been arranged properly. However, due to time constraints and lack of proper lighting, I could not determine if all drums were properly closed. This will be done at a later date.

According to Section B of the Consent Decree, the Chase inventory is to be reduced by one-fifth every ninety days. As of October 29, 1987, they were to have disposed of 743 drums. They have, as per Mr. Hein, only staged some Chase drums according to the categories of solid or liquid. Mr. Hein stated that they were surprised as to the number of drums which contain liquid. He said they have taken samples of these drums, but have not yet had them analyzed. Mr. Hein indicated that they may want to pump the liquids and blend them with their fuel.

On November 16, 1987, I called Mr. Hein concerning this matter. I informed him that, after my review of the Consent Decree, I could see no provision for them to do anything with the Chase inventory other than to solidify or incinerate the waste. He said he didn't read it that way, but they would not put any Chase waste into fuel stock until they get a ruling. I also asked how they were correlating the samples collected with the drums from which they were taken, since I had seen no markings on the drums. He said that "Alvin could tell" by the order in which they were collected. I strongly suggested that they assign a number to the drum and the sample jar at the time of sampling. He agreed to do this.

Also in Section A4, is the requirement that "no container containing ignitable or reactive waste shall be stored within 50 feet of the facilities property line...". The lines have been painted in the buildings, however, the drums in Building #3 are partially over the line.

A5 calls for a complete written inventory to be submitted by September 29, 1987. According to Mr. Hein, he expects to have this submitted the week of November 9th, 1987.

RECEIVED

NOV 30 1987

IEPA/DLPC

INSPECTION REPORT

RECEIVED EPA Number: ILD980700744

~~DEC 22 1987~~

~~LEA/DLPC~~

Telephone: 16181-271-2373

State: TX Zip Code: _____

Regulated As: G/T/T5

LDF? yes no HPV? yes no 90 Day Follow-up Required? yes no

Region: 6 Date of Inspection: 11-6-87 From: 10:00 to 11:30

Weather (LDF Only): ///

Withdrawal:

Record Review: Follow-up to Inspection of : Other: X

See memo dated

Small Quant. Gen:: Claimed Nonhandler: Other(Specify in narrative):

Notified As/Regulated As Matrix Number: 104 Key Letter: L

Notification date, _____, from initial _____ or subsequent notification.

Part A date, _____, from initial _____ or amended _____ Part A:

Part 8 permit application submitted? yes no

Has the firm been referred to: USEPA? yes no ; IAG? yes no ; County:

States Attorney? yes no . Date of referral to USEPA: , ,

IAG: _____, County States Attorney: _____

Federal Court Order Issued: _____ State Court Order Issued: _____

CACO)-USEPA : COMPLIANCE ORDER ISSUED:

(CAFO)-USEPA FINAL Order Issued: _____ Illinois PCB Order Issued: _____

Completed by - P M McCarthy

TSD Facility Activity Summary

[illegible]